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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
22 Local Civil Rule 5.6 for leave to file under seal Motion to Amend Scheduling Order:
23 Common Benefit Fees and Expense Reimbursement ("Motion to Amend").

24 The Motion to Amend contains confidential information relating to procedures
25 affecting all Participating Counsel as defined in Case Management Order No. 6 (Doc.
26 372). Furthermore, as the Court is undoubtedly aware, all filings related to the Common
27 Benefit Fee and Cost Committee have been filed under seal in this litigation.
28 Accordingly, good cause exists for sealing the Exhibit.

1 RESPECTFULLY SUBMITTED this 13th day of May 2021.

2 BEUS GILBERT MCGRODER PLLC

3 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine